SM Web Systems – Cookie Policy

Last updated: 8 February 2026

This Cookie Policy explains how SM Web Systems (Pty) Ltd ("SM Web Systems", "we", "us", "our") uses cookies and similar tracking technologies on our websites:

- smwebsystems.com (primary domain)
- training.smwebsystems.com (subdomain)

This Cookie Policy should be read together with our Privacy Policy, which provides detailed information about how we collect, use, and protect your personal information.

1. Who we are

SM Web Systems (Pty) Ltd
 Registration Number: 2026/031662/07
 Address: 122 Roberts Avenue, Kensington, Gauteng, South Africa, 2094
 Email: userdata@smwebsystems.com and hr@smwebsystems.com
 Phone: +27 67 062 3697

Information Officer (POPIA): Mukhtar Meer
 Email: hr@smwebsystems.com

2. What are cookies?

Cookies are small text files that are placed on your device (computer, smartphone, tablet) when you visit a website. Cookies are widely used to make websites work more efficiently and provide information to website owners.

2.1 Types of cookies by duration

Session cookies – Temporary cookies that expire when you close your browser. They allow websites to link your actions during a single browsing session.

Persistent cookies – Cookies that remain on your device for a set period (or until you delete them). They help websites remember your preferences and actions across multiple visits.

2.2 Types of cookies by purpose

Strictly necessary cookies – Essential for the website to function. Without these, core features like security, network management, and accessibility cannot work properly.

Analytics and performance cookies – Collect information about how visitors use a website (e.g., which pages are visited most often, error messages). This helps us improve website performance and user experience.

Functional cookies – Remember choices you make (e.g., language, region, preferences) to provide enhanced, personalized features.

Advertising and social media cookies – Used to deliver relevant advertisements and track the effectiveness of advertising campaigns. They may also allow you to share content via social media platforms.

3. What cookies and tracking technologies do we use?

We use the following cookies and tracking technologies on our websites:

3.1 Strictly necessary cookies

These cookies are essential for our websites to function and cannot be switched off. They are usually only set in response to actions you take, such as setting privacy preferences, logging in, or filling in forms.

- Session management cookies – Maintain your session while browsing
- Security cookies – Detect abuse and protect against attacks
- Load balancing cookies – Distribute traffic efficiently across servers

Duration: Session or up to 24 hours
Legal basis: Legitimate interest (essential website operation)

3.2 Google Analytics

We use Google Analytics to understand how visitors interact with our websites. Google Analytics uses cookies to collect information such as:

- Pages visited and time spent on each page
- How you arrived at our site (referral source)
- Device type, browser, and operating system
- Approximate geographic location (city, region, country derived from IP address)

Cookies set by Google Analytics include:

- _ga – Distinguishes unique users (persistent, 2 years)
- _gid – Distinguishes unique users (persistent, 24 hours)
- _gat – Throttles request rate (persistent, 1 minute)

Data retention: 26 months (configurable)
Legal basis: Consent (non-essential analytics)
Privacy controls: Google Analytics is configured to anonymize IP addresses

More information: Google Analytics Privacy

3.3 Google Tag Manager

We use Google Tag Manager to manage and deploy tracking tags (including Google Analytics, advertising pixels, and other tools) without modifying website code directly.

Google Tag Manager itself does not collect personal information, but it loads other tags that may do so (e.g., Google Analytics, advertising tags).

Legal basis: Consent (when it loads non-essential tags)
More information: Google Tag Manager Privacy

3.4 Other Google Services

We may use additional Google services, including:

- Google reCAPTCHA – Protects forms from spam and abuse (strictly necessary for security)
- Google Fonts – Loads web fonts for consistent typography (functional)
- Google Ads / Conversion Tracking – Measures advertising campaign effectiveness (advertising cookies, requires consent)

Legal basis: Varies by service (security = legitimate interest; advertising = consent)
More information: Google Privacy Policy

3.5 Hotjar

We use Hotjar for session recording, heatmaps, and user feedback tools. Hotjar helps us understand how users interact with our site (e.g., where they click, scroll, and navigate).

Information collected by Hotjar:

- Mouse movements, clicks, and scrolling behavior
- Device type, browser, screen resolution
- Pages visited and time spent
- Form interactions (Hotjar does NOT record passwords or sensitive payment information)

Cookies set by Hotjar include:

- _hjSessionUser_* – Identifies unique users across sessions (persistent, 1 year)
- _hjSession_* – Holds current session data (session, 30 minutes)
- _hjIncludedInPageviewSample – Determines if user is included in data sampling (session, 30 minutes)

Data retention: Up to 365 days
Legal basis: Consent (non-essential analytics)
Privacy controls: Hotjar anonymizes IP addresses and excludes sensitive data

Opt-out: You can opt out of Hotjar tracking at https://www.hotjar.com/policies/do-not-track/
More information: Hotjar Privacy Policy

3.6 Social media cookies and tracking

When you visit our official pages on third-party social media platforms or interact with embedded social content on our websites, those platforms may set cookies and collect information about your activity.

Platforms we use:

- LinkedIn (Privacy Policy)
- Facebook (Privacy Policy)
- Instagram (Privacy Policy)
- TikTok (Privacy Policy)
- YouTube (Privacy Policy)
- Pinterest (Privacy Policy)
- X / Twitter (Privacy Policy)
- Reddit (Privacy Policy)
- Medium (Privacy Policy)

What these platforms collect:

- Your interactions with our content (likes, shares, comments, follows)
- Your IP address, device type, and browser
- Cookies set by the platform for analytics and advertising

Legal basis: Consent (when you interact with our content on those platforms)
 Your control: Manage your privacy settings directly on each platform

We do not control these third-party cookies. Please review each platform's privacy policy for more information.

4. Legal basis for using cookies

We use cookies on the following legal grounds:

4.1 Under POPIA (South Africa)

· Strictly necessary cookies: Legitimate interest (essential for website operation and security)

· Analytics and performance cookies: Consent (you can accept or decline via our cookie banner)

· Advertising cookies: Consent (you can accept or decline via our cookie banner)

4.2 Under GDPR (EU/EEA visitors)

· Strictly necessary cookies: Legitimate interest under Article 6(1)(f) GDPR

· Non-essential cookies (analytics, advertising): Consent under Article 6(1)(a) GDPR and ePrivacy Directive

4.3 Under CCPA/CPRA (California residents)

Some cookies may involve "sharing" personal information for cross-context behavioral advertising. You have the right to opt out of this sharing (see Section 6 below).

5. Cookie consent banner

When you first visit our websites, you will see a cookie consent banner that allows you to:

- Accept all cookies – Consent to all cookies, including analytics and advertising
- Reject non-essential cookies – Only strictly necessary cookies will be used
- Manage preferences – Choose which categories of cookies to accept

Your choices are stored in a cookie (ironically!) so we remember your preferences on future visits.

You can change your cookie preferences at any time by:

- Clicking the "Cookie Settings" link in our website footer, or
- Deleting cookies via your browser settings (see Section 6 below)

6. How to manage and delete cookies

You have several options to control or delete cookies:

6.1 Browser settings

Most web browsers allow you to manage cookies through their settings. You can:

- Block all cookies
- Block third-party cookies only
- Delete cookies after each session
- Receive a notification before a cookie is set

How to manage cookies in common browsers:

- Google Chrome: Settings > Privacy and security > Cookies and other site data
  Instructions
- Mozilla Firefox: Settings > Privacy & Security > Cookies and Site Data
  Instructions
- Microsoft Edge: Settings > Cookies and site permissions
  Instructions
- Safari: Preferences > Privacy > Manage Website Data
  Instructions

Note: Blocking or deleting cookies may affect your experience on our websites. Some features may not work properly.

6.2 Opt-out tools

You can opt out of specific tracking technologies:

Google Analytics:
 Install the Google Analytics Opt-out Browser Add-on

Hotjar:
 Opt out at https://www.hotjar.com/policies/do-not-track/

Advertising cookies:

- Digital Advertising Alliance (DAA): optout.aboutads.info
- Network Advertising Initiative (NAI): optout.networkadvertising.org
- European Interactive Digital Advertising Alliance (EDAA): youronlinechoices.eu

6.3 Mobile device settings

On mobile devices, you can manage tracking through:

iOS (iPhone/iPad):
 Settings > Privacy > Tracking > Disable "Allow Apps to Request to Track"

Android:
 Settings > Google > Ads > Opt out of Ads Personalization

6.4 Do Not Track (DNT) signals

Some browsers support "Do Not Track" (DNT) signals. However, there is no universal standard for how websites should respond to DNT signals. We currently do not respond to DNT signals, but you can manage cookies using the methods above.

7. Your rights

Depending on where you are located, you have rights regarding cookies and tracking:

7.1 POPIA (South Africa) and GDPR (EU/EEA)

- Right to withdraw consent: You can withdraw cookie consent at any time via our cookie banner or browser settings
- Right to access: Request information about what cookies have collected about you
- Right to erasure: Request deletion of data collected via cookies

7.2 CCPA/CPRA (California)

- Right to opt out of "sharing": Request that we do not share your personal information for cross-context behavioral advertising
- Right to know: Request information about what cookies collected about you
- Right to delete: Request deletion of data collected via cookies

To exercise these rights, contact us at userdata@smwebsystems.com.

8. Data retention

Cookie data retention varies by tool:

- Session cookies: Deleted when you close your browser
- Google Analytics: 26 months (configurable)
- Hotjar: Up to 365 days
- Advertising cookies: Typically 30–90 days, varies by platform

You can delete cookies at any time using your browser settings.

9. International data transfers

Some of our cookie providers (e.g., Google, Hotjar) process data in countries outside South Africa, including the United States and European Union.

We ensure that appropriate safeguards are in place, such as:

- Standard contractual clauses
- Data processing agreements
- Compliance with POPIA, GDPR, and CCPA/CPRA

For more information, see our Privacy Policy (Section 5: International Transfers).

10. Children's privacy

Our websites are not directed at children under 16, and we do not knowingly use cookies to collect information from children. If you believe we have collected such information, please contact us.

11. Changes to this Cookie Policy

We may update this Cookie Policy from time to time to reflect changes in our practices, technologies, or legal requirements.

When we make material changes, we will:

- Update the "Last updated" date at the top of this page
- Notify you via the website or email (where appropriate)

Your continued use of our websites after any changes constitutes acceptance of the updated Cookie Policy.

12. Contact us

If you have any questions about this Cookie Policy or how we use cookies, please contact:

SM Web Systems (Pty) Ltd
 Email: userdata@smwebsystems.com and hr@smwebsystems.com
 Phone: +27 67 062 3697
 Address: 122 Roberts Avenue, Kensington, Gauteng, South Africa, 2094

Information Officer (POPIA): Mukhtar Meer
 Email: hr@smwebsystems.com

13. Complaints

If you believe we have not handled cookies in accordance with POPIA, GDPR, or other applicable laws, you may lodge a complaint with:

South Africa – Information Regulator:
 Website: www.justice.gov.za/inforeg
 Email: inforeg@justice.gov.za
 Phone: +27 (0)10 023 5200

EU/EEA – Your local Data Protection Authority

California – California Attorney General's Office:
 Website: oag.ca.gov/privacy

END OF COOKIE POLICY